

REMARKS/ARGUMENTS

Claims 1-21 stand in the present application, claims 1, 7, 8, 20 and 21 having been amended. Reconsideration and favorable action is respectfully requested in view of the above amendments and the following remarks.

In the Office Action, the Examiner has rejected claims 1-4, 6-10, 16, 20 and 21 under 35 U.S.C. § 102(e) as being anticipated by Lundblad et al. ("Lundblad"), has rejected claim 5 as being unpatentable over Lundblad in view of Dutta et al. ("Dutta"), and has rejected claims 11-15 and 17-19 under 35 U.S.C. § 103(a) as being unpatentable over Lundblad in view of Grove et al. ("Grove"). Applicant respectfully traverses the Examiner's §§ 102 and 103 rejections of the claims. More particularly, the above-described claim amendments are believed to more clearly patentably define the present claims over any combination of the cited references, as will be explained in greater detail below.

Applicant's invention is directed to a multi-modal interface of the type described in the present application wherein two presentation or output modes (e.g., an HTML browser (29) and a telephone (29) as illustrated in present Figure 1) take their feeds from different sources. In the example described on page 6 lines 4 onwards of the present specification, the browser takes an input from the Internet (30) while the telephone is connected via the PSTN to an interactive voice response (IVR) unit (22).

As explained on page 1 lines 17 to 26, prior art systems designed for use on self-contained machines typically include a processor which directly controls both the retrieval and delivery of visual and audio information, so getting them to appear to the

user in the correct sequence and timing is not usually a significant problem. See Background portion of present application. In contrast, Applicant's invention is directed to systems such as the one described above, where there is no central control over the retrieval and delivery of information, but where information is obtained and delivered from different sources, e.g., the Internet and an IVR unit.

In Applicant's invention, control is provided by a synchronization server or manager (38) which undertakes the control of delivery in the manner described on, e.g., page 9, lines 20 to 26 of the present specification, so that information is presented to the user in a coordinated manner. The synchronization server is located within the system to communicate with the multiple information sources (e.g., the Internet or the IVR unit) within the multi-modal interface system, where such information source may be stored separately, and for which retrieval comprises different processes or communication paths to the user, often on multiple output devices.

As noted in previous filed responses, Lundblad describes a method of synchronizing the presentation of audio data and video data which has been delivered in a single transport stream (see, Lunblad at column 1, lines 10-11: "data streams contain both encoded video data and encoded audio data"). Issues of separating the video and audio portions of the stream are involved (see, *inter alia*, column 4, line 49), which confirm the reception of both data types in a single stream. Thus Lundblad is not concerned with information which originates from separate sources, as is Applicant's invention involving the above describe multi-modal interface. The Lundblad system is more akin to the prior art "self-contained" machines referred to above, wherein

synchronization is performed within a device receiving the data stream – i.e., the described and shown set-top box. Indeed, this is made clear in Lundblad at, for example, Figures 3 and 4, wherein the decoding system (400) is stated to be located within the set top box (106) which receives the stream comprising both audio and video elements. See Lundblad at, *inter alia*, column 4, lines 45 to column 6, line 11.

To more clearly emphasize this patentable distinction over Lundblad, Applicant has amended independent claims 1, 7, 8, 20, and 21 to require synchronizing first information received from a first source and second information received from a second source in a multi-modal interface. Since Lundblad does not teach or suggest a multi-modal interface receiving information from two sources the amended independent claims and their respective dependent claims patentably define over the cited reference.

In addition the secondary references of Dutta and Grove do not solve this deficiency of Lundblad. Hence claims 5, 11-15 and 17-19 patentably define over the cited references taken singly or in any combination.

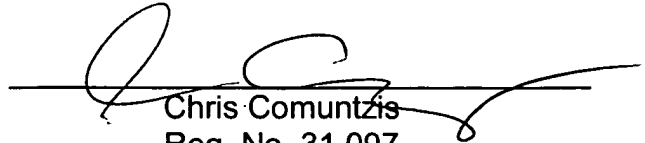
Therefore, in view of the above amendments and remarks, it is respectfully requested that the application be reconsidered and that all of claims 1-21, standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a supplemental response or an Examiner's amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

Richard WISEMAN
Appl. No: 10/509,084
December 1, 2008

Respectfully submitted,

NIXON & VANDERHYE P.C.

By:


Chris Comuntzis
Reg. No. 31,097

CC:lmr
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100